

For Public

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In The Matter of Charges and
Complaint Against
WILLIAM RAMOS, M.D.
Respondent.

Case No. 07-5299-1

FILED 10 January 2008


EXECUTIVE DIRECTOR

COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the state of Nevada, composed of Sohail U. Anjum, M.D., S. Daniel McBride, M.D, and Donald H. Baepler, Ph.D., D.Sc. by and through Edward O. Cousineau, Deputy General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that William Ramos, M.D., hereinafter referred to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent is licensed in active status to practice medicine in the state of Nevada, and at all times alleged herein, was so licensed by the Nevada State Board of Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A was a twenty-three-year-old-year-old female at the time of events at issue. Her true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.

3. Patient A was pregnant when she presented to Respondent on March 8, 2005, for an elective abortion. Patient A's last menstrual period was documented to be in the first week of January. Patient A underwent an ultrasound procedure which was performed by Dr. Ramos. An "empty" uterus was noted in the medical records. There is no indication in the medical records that Respondent performed a pelvic examination of Patient A.

1 4. The following day, Patient A presented to a different practitioner who ordered various
2 diagnostic tests based upon Patient A's lower quadrant tenderness. An ultrasound was accomplished on
3 Patient A and showed approximate eight-week ectopic pregnancy. Patient A was advised that she
4 would need immediate surgical intervention and underwent a partial salpingectomy surgical procedure
5 that same day.

6 5. Based upon the foregoing, Respondent failed to use the reasonable knowledge, skill and
7 expertise ordinarily used in similar circumstances in his treatment of Patient A, as Respondent should
8 have preformed a more thorough history and physical of the patient based upon the patient's presentment
9 circumstance, including a pelvic examination, and further diagnostic evaluation, including obtaining a
10 beta h-CG value to rule out the possibility that Patient A was suffering an ectopic pregnancy.

11 6. Section 630.301(4) of the Nevada Revised Statutes provides that malpractice, defined as
12 the failure to use the reasonable knowledge, skill and expertise ordinarily used in similar circumstances,
13 is grounds for discipline.

14 7. Respondent committed malpractice in the course of providing care and treatment to
15 Patient A and is subject to discipline by the Nevada State Board of Medical Examiners as provided in
16 NRS 630.352.

17 WHEREFORE, the Investigative Committee prays:

18 1. That the Nevada State Board of Medical Examiners fix a time and place for a formal
19 hearing;

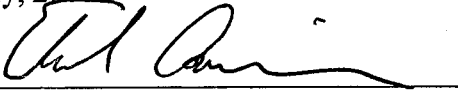
20 2. That the Nevada State Board of Medical Examiners notice Respondent of the charges
21 herein against her, the time and place set for the hearing, and the possible sanctions against her;

22 3. That the Board determine what sanctions it deems appropriate to impose for the violation
23 committed by Respondent; and

24 4. That the Board make, issue and serve on Respondent its findings of facts, conclusions of
25 law and order, in writing, that includes the sanctions imposed.

26 DATED this 10th day of January, 2008

27 By:

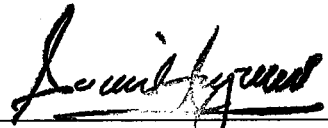
28 
Edward O. Cousineau
Attorney for the Investigative Committee of the
Nevada State Board of Medical Examiners

VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Sohail U. Anjum, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 10th day of January, 2008.




Sohail U. Anjum, M.D.

1 **CERTIFICATE OF MAILING**

2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and
3 that on the 10th day of January 2008, I served a file copy of the COMPLAINT, NOTICE OF
4 PRE-HEARING CONFERENCE & HEARING and PATIENT DESIGNATION, along with
5 appointment letter, by mailing via USPS certified return receipt mail to the following:

6 William Ramos, M.D.
7 1670 E. Flamingo Rd., Ste. C
8 Las Vegas, NV 89119

9 Dated this 10th day of January 2008.

10 
11 _____
12 Angelia Donohoe
13 Legal Assistant
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28